

(ryu)

HOWARD TRAPP INCORPORATED  
200 Saylor Building  
139 Chalan Santo Papa  
Hagåtña, Guam 96910  
Telephone (671) 477-7000

Attorney for defendant

**FILED**  
DISTRICT COURT OF GUAM

9  
JAN 18 2006 9P

MARY L.M. MORAN  
CLERK OF COURT

DISTRICT COURT OF GUAM

-----

UNITED STATES OF AMERICA,	(	Criminal Case No. 04-00008
	)	
Plaintiff,	(	DECLARATION
	)	
vs.	(	
	)	
KUANG-HUA CHEN,	(	
	)	
Defendant.	(	

-----

I, Howard Trapp, declare that I am the attorney of record for defendant.

2. I am retained.

3. I am informed by the government and believe that the government intends to call, as one of its witnesses on the trial of this case, a certain Peter Weay Jung Shih.

4. I was unaware of the government's intention until the late afternoon of January 10, 2006.

5. The government has moved the Court to determine whether I have an inherent conflict of interest regarding my representation of defendant and, if so, whether such conflict

**ORIGINAL**

(DECLARATION)  
Criminal Case No. 04-00008

may be properly cured by waiver.

6. The grounds for the motion arise out of the fact that I represented Mr. Shih in a prior, unrelated matter.

7. I have not been in touch with Mr. Shih for years.


8. I am informed by the government and believe that Mr. Shih is a resident of San Francisco, California.

9. The government has offered to supply me with Mr. Shih's address and telephone number so that I can communicate with Mr. Shih with a view toward resolving issues presented by the motion.

10. I make this declaration in support of the stipulation filed herewith.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 18, 2006, at Hagåtña, Guam.

  
\_\_\_\_\_  
HOWARD TRAPP

(DOCUMENT\Decl.KChen)

# DECLARATION OF SERVICE

I, Reina Y. Urbien, declare that I am an administrative assistant employed in the office of Howard Trapp Incorporated, Howard Trapp, Esq., the attorney for defendant herein, and that on January 19, 2006, I served the document to which this declaration is annexed on Marivic P. David, Esq., Assistant United States Attorney, the attorney for plaintiff herein, by leaving a copy at her office at Office of the United States Attorney for Guam and the Northern Mariana Islands, Suite 500, Sirena Plaza, 108 Hernan Cortez Avenue, Hagåtña, Guam, her last known address, with a person in charge thereof.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 19, 2006, at Hagåtña, Guam.

  
REINA Y. URBIEEN